

Produced in Native Format

EXHIBIT 321

Controlled Substance Risk Assessment: Executive Summary

Project Status

Project Name	Project Leader	Purpose	Delivery Date	Project Status
Suspicious Order Identification, Monitoring, and Reporting (SOMP)	Kristy Spruell	Design & operate a systems to detect suspicious orders and report to the DEA when discovered	TBD	R
Maximum order limits (SOMP)	Kristy Spruell	Establish additional maximum order limits of highly abused drugs	TBD	Y
Prescriber validation	Darren Townzen	Enhance or replace or current vendor prescriber data source to ensure accuracy & completeness of data	Ongoing	G
Refusal to Fill	Brad Nelson	Establish a process for the analysis of refusal to fill data and reporting problematic prescribers or patients internally	Ongoing	Y
Security Cameras CCTV - Pharmacy	Teresa Mahavier	Establish a remediation plan regarding our CCTV standards to meet our obligations with DEA MOA	May 2015	Y
Corporate Processes	Tim Koch and Shelley Tustison	Create an advisory panel to facilitate the evaluation, implementation and accountability for risk assessment recommendations	Not started	Y
POM updates & Revisions	Tim Koch and Shelley Tustison	Complete suggested updates to POM's to ensure consistency in execution	Not started	Y

Suspicious Order Identification, Monitoring, and Reporting (SOMP): Timeline

Measure of Success & Deliverables

Success Measures

Key Deliverables

Updates

Current Week:

Prior Week:

Roadblocks

Current Week:

Prior Week:

Maximum order limits (SOMP): Timeline

Measure of Success & Deliverables

Success Measures

Key Deliverables (*Italics = completed)

Updates

Current Week:

Prior Week:

Roadblocks

Current Week:

Prior Week:

Prescriber Validation: Timeline

Measure of Success & Deliverables

Success Measures

Key Deliverables (*Italics = completed)

Updates

Current Week:

Prior Week:

Roadblocks

Current Week:

Prior Week:

Refusal to Fill: Timeline

Measure of Success & Deliverables

Success Measures

Key Deliverables (*Italics = completed)

Updates

Current Week:

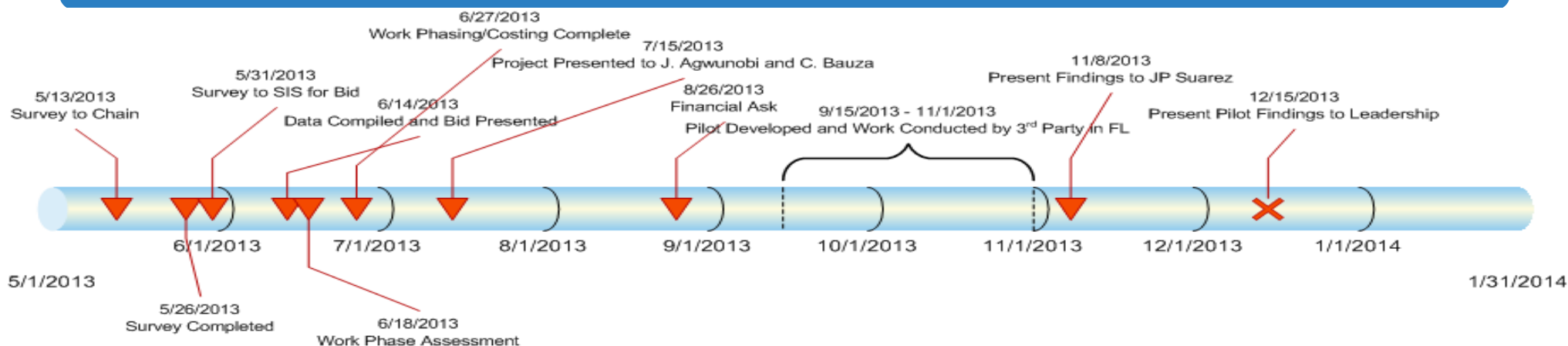
Prior Week:

Roadblocks

Current Week:

Prior Week:

CCTV – Pharmacy: Timeline



Measure of Success & Deliverables

Success Measures

- Clarification of Standards to meet our obligations with DEA MOA
- Meet Obligations of DEA MOA

Key Deliverables (*Italics = completed)

- *Survey completion deadline: 5/26*
- *Report Findings and work phasing in the Compliance Focus Meeting: 6/27*
- *Project presented to Carmen Bauza and John Agwunobi: 7/15*
- *Financial Ask presented to JP Suarez 8/26*
- *Develop process for Pilot to be conducted in FL including all training for 3rd party*
- Complete 30 Store Pilot in FL, 11/8
- Present costing validation based on results of pilot, to Leadership 12/15

Updates

Current Week:

- SAP # Received
- Work by 3rd party began on 10/28 to be completed by 11/8
- Develop timeline for 12 month push for project completion beginning in January 2014
- Process Development continuance for yearly audit process including how and where the audit is received and stored

Prior Week:

- JP Approved Funding. Will have SAP# by EOD 10/18
- 3rd party to begin work on 30 store pilot in FL, 10/21 & to be completed no later than 11/8
- Findings to be presented to leadership by 12/15.

Roadblocks

Current Week:

- N/A

Prior Week:

- Need SAP # for work to commence on 10/21

Corporate Processes: Timeline

Measure of Success & Deliverables

Success Measures

Key Deliverables (*Italics = completed)

Updates

Current Week:

Prior Week:

Roadblocks

Current Week:

Prior Week:

POM updates & Revisions: Timeline

Measure of Success & Deliverables

Success Measures

Key Deliverables (*Italics = completed)

Updates

Current Week:

Prior Week:

Roadblocks

Current Week:

Prior Week: